

TEXAS EASTERN

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BY \_\_\_\_\_  
CRIMINAL NO. 6:11CR-74  
JUDGE DAVIS / GUTHRIE

# SEALED

[illegible]

THE UNITED STATES GRAND JURY CHARGES:

Violation: 21 U.S.C. § 846  
(Conspiracy to possess with intent to distribute and distribution of at least 112 grams but less than 196 grams of a mixture or substance containing a detectable amount of cocaine base, also known as “crack cocaine”)

Indictment - Page 1

[REDACTED]  
[REDACTED]  
[REDACTED] the defendants herein, did knowingly, intentionally, and unlawfully, combine, conspire, confederate, and agree together, with each other and with others, both known and unknown to the United States Grand Jury, to violate a law of the United States, to-wit, 21 U.S.C. § 841(a)(1), prohibiting the possession with intent to distribute and distribution of at least 112 grams but less than 196 grams of a mixture or substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

In violation of 21U.S.C. § 846.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

Pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461

As the result of committing one or more of the foregoing offenses [21U.S.C. § 846] alleged in this indictment, defendants herein shall forfeit to the United States pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461:

1. any property constituting, or derived from, and proceeds the defendants obtained, directly or indirectly, as the result of such violation;
2. any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, and/or,
3. any and all firearms, ammunition and accessories seized from defendants, including but not limited to the following:

**CASH PROCEEDS:**

\$70,000 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations.

**Substitute Assets**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by defendants.

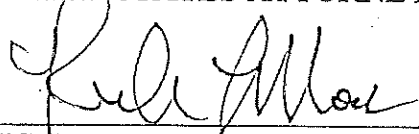
By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461.

A TRUE BILL



GRAND JURY FOREPERSON

JOHN M. BALES  
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8-4-2011  
Date

